

April 27, 1982

CD82-1 (LD, HD, MC, FE)

Subject: Implementation of a Numbering System for Correspondence of General Interest

Reference: None

Dear Manufacturer:

In response to a suggestion at the manufacturers meeting on January 20, 1982, I am instituting a system for numbering correspondence which is of general interest to the industry. It will not be used for manufacturer-specific correspondence. All future letters will be numbered in sequence, the system will not be applied retroactively to previous letters.

Each letter will have a structure similar to this one, with letter number, subject, and references indicated. When appropriate, the applicability of a particular letter will be indicated by a suffix to the letter number. This letter CD82-1 (LD, HD, MC, FE), applies to light-duty (LD), heavy-duty (HD), and motorcycle (MC), emission regulation as well as the fuel economy (FE) program. The subject of each letter will further delineate its applicability. When appropriate, each letter will indicate references to regulations, advisory circulars, or previous letters.

The purpose of this numbering system is to permit easier identification of a particular letter. By using the classification suffix, a manufacturer can quickly determine if a letter applies to its particular product.

If you have any questions or comments as to how we can make this system more useful to you, please direct your suggestions to Richard W. Nash of my staff, he can be reached at (313) 668-4412.

Sincerely yours,

Robert E. Maxwell, Director  
Certification Division  
Mobile Source Air Pollution Control

January 11, 1982

Dear Manufacturer:

SUBJECT: Durability-Data Vehicle1 Reconfiguration

On October 13, 1981, EPA published an interim final rule implementing procedural changes to reduce certification costs. Among those changes, we revised §§86.082-26(a)(7) and (b)(9) delaying the durability-data vehicle reporting requirement until after the 5,000-mile test. Parallel revisions were also included for emission-data vehicles, requiring manufacturers to report these vehicles only after emission testing for certification is completed. Specific provisions were also added [§§86.082-24(b)(1)(iii) and (b)(2)(V)] allowing emission-data vehicles to be reconfigured to represent other selections.

Several manufacturers have asked whether the new durability-data vehicle reporting liberalizations allow them to alter calibrations prior to declaring the existence of the vehicle to EPA. My staff initially answered this interpretive question by saying no, since there are no specific provisions in the new regulations allowing durability-data vehicle reconfigurations. We have since taken a closer look at the regulations and have decided to reverse this decision based on our original intent and purpose of the regulation changes.

The purpose of the liberalized durability-data vehicle reporting requirement, as stated in the preamble to the October 13, 1981 rule (FR 50466), is to allow manufacturers to screen out potential problem vehicles before continuing the durability test sequence. This would spare the manufacturer from continuing to run a vehicle that would ultimately not be used for certification and for which additional backup vehicles would have to be run. Since linecrossing is a concern when running durability-data vehicles, it is probable that manufacturers will choose not to continue some durability-data vehicles (yet undeclared) because their calibrations would likely cause them to linecross.

EPA has historically recognized the difficulty in establishing calibrations for durability-data vehicles so far in advance of production. The October 13, 1981 rule changes allow manufacturers to discard vehicles that would not likely meet their production intent. However, additional savings could be realized if manufacturers did not have to replace these vehicles or "regreen" them and start over.

1. For the purposes of this letter, the term "vehicle" also includes heavy-duty engines. Similarly, whenever mileages are indicated, the appropriate number of hours applies to heavy-duty engines.

Durability-data vehicle recalibration prior to declaring the vehicles to EPA is consistent with reconfiguration of test vehicles as specifically allowed in

emission-data vehicle testing and in reconfiguring durability-data vehicles to represent emission-data vehicles. The only constraints EPA has imposed on the practice is that the vehicle be altered only within its engine family and exhaust emission control system, and that the vehicle be stabilized and representative of design intent before testing. Therefore, within these same constraints, we believe that manufacturers are allowed under the current regulations to alter calibrations prior to vehicle declaration to EPA. Of course, all data used in the determination of the deterioration factor for a durability-data vehicle must be generated with the vehicle in the same configuration, beginning with a 5,000-mile test.

Manufacturers must not misconstrue this privilege as an allowance to simply install "fresh" parts onto a vehicle at 5,000 miles. The regulations are still clear in stating [§86.082-26(a)(4)(i)] that durability-data vehicles "shall be driven, with all emission control systems installed and operating, for 50,000 miles or such lesser distance as the Administrator may agree to as meeting the objective of this procedure." (A similar requirement is contained in §86.082-26(b)(6) for heavy-duty engines.) It is the manufacturer's responsibility to ensure that any emission-related components installed on a durability-data vehicle are representative of at least the mileage of the vehicle on which they are installed. In accordance with §§86.082-26(a)(7) and (b)(9), the manufacturer must retain records of all emission tests and maintenance, including reconfigurations, performed on durability-data vehicles. Some guidance in this area was provided in our letter of October 26, 1981, "Questions on the Revised Certification Procedures," question number 13. This question concerned the allowance to reconfigure a durability-data vehicle to represent an emission-data vehicle at the proper test point. (Please note that contrary to what is stated in the answer to question number 13, the manufacturer does not necessarily have to restore the durability-data vehicle to its original configuration if the manufacturer wishes to retain that emission-data calibration for durability-data vehicle testing.)

Sincerely yours,

Robert E Maxwell, Director  
Certification Division  
Mobile Source Air Pollution Control